

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICHAEL P. TIERNEY,

Plaintiff,

-against-

GERARD A. NEUMANN,

Defendant.

ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/2/08

1:07-CV-04090-BSJ-JCF

REVISED JOINT

DISCOVERY PLAN + ORDER

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, Counsel for Plaintiff Michael P. Tierney ("Plaintiff") and counsel for Defendant Gerard A. Neumann ("Defendant"; together with Plaintiff, the "Parties") have conferred with each other and now respectfully submit this Revised Joint Discovery Plan to the Court.

I. PROPOSED DEADLINES

The parties jointly propose the following deadlines:

Parties' deadline to respond to discovery requests served before January 31, 2008	February 29, 2008
Deadline to join other parties	May 8, 2008
Parties' deadline to designate expert witnesses, including deadline to make Rule 26(a)(2) Expert Disclosures	May 15, 2008
Parties' deadline to designate rebuttal expert witnesses, including deadline to make Rule 26(a)(2) Expert Disclosures	May 30, 2008
Deadline to complete discovery	June 30, 2008
Deadline to file motions; including summary judgment, other dispositive motions and objections to experts.	July 31, 2008
Deadline to submit Joint Pretrial Order if no summary judgment or other dispositive motions filed	July 31, 2008
Deadline to submit Joint Pretrial Order if a Party files a summary judgment or other dispositive motion	Within 30 days after date a ruling on the dispositive motion is entered

II. RULE 26(a)(1) DISCLOSURES

The Parties have exchanged Rule 26(a)(1) initial disclosures.

III. DISCOVERY

The Parties anticipate that discovery will be completed by June 30, 2008.

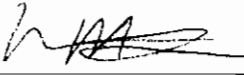
Discovery will be required on both liability and damages in this case. The forms of discovery permitted under the Federal Rules of Civil Procedure will be appropriate in this case; including interrogatories, requests for production, requests for admission and depositions of the parties, third parties and expert witnesses.

IV. PROTECTIVE ORDER

The parties agree that the previously-entered protective order is appropriate in this case to prevent the public dissemination of confidential materials.

Dated: New York, New York
January 2, 2008

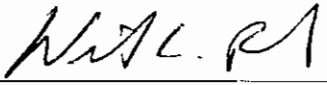
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Dated: New York, New York
January 2, 2008

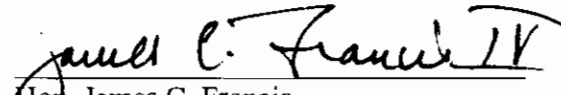
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Attorneys for Michael P. Tierney.

SO ORDERED.

Dated: 1/2/08


Hon. James C. Francis
United States Magistrate Judge